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December 17, 2019

Via ECF

Hon. Christian F. Hummel
United States Magistrate Judge
United States District Court for the Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway, Room 441
Albany, New York 12207

RE: Hempchain Farms, LLC v. Kenneth Sack, Organic Growers LLC and
Eagle Springs Organic LLC
Case No. 1:19-cv-01364-FJS-CFH

Dear Judge Hummel:

This firm represents Plaintiff Hempchain Farms, LLC in the above-referenced action. We are writing to respectfully request an extension of time for Plaintiff to file responding papers to Defendants' Motion to Dismiss returnable January 24, 2020.

Defendants' served a Motion to Dismiss Plaintiff's Complaint on December 16, 2019. Pursuant to FRCP, Plaintiff's responding papers are due on January 7, 2020 and Defendants' reply papers are due on January 13, 2020.

Plaintiff respectfully seeks to extend their time to respond to this Motion to January 31, 2020, and for Defendants' time to file reply papers to February 14, 2020.

Counsel has conferred with Defendants' counsel requesting an extension of time in order to develop an appropriate response. Defendants' counsel has agreed to such extension as memorialized in the attached proposed Stipulation and Order.

Thank you for your time and consideration to this matter.

Respectfully submitted,

Paul M. Freeman

Cc: Counsel of Record (via ECF)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

HEMPCHAIN FARMS, LLC,

Plaintiff,

-versus-

Case No. 1:19-cv-01364-FJS-CFH

KENNETH SACK, ORGANIC GROWERS LLC and
EAGLE SPRINGS ORGANIC LLC,

**STIPULATION AND ORDER
EXTENDING TIME TO
RESPOND TO MOTION TO
DISMISS**

Defendants.

WHEREAS Plaintiff Hempchain Farms, LLC ("Plaintiff") served the Complaint in the above-referenced action on Defendants Kenneth Sack, Organic Growers LLC and Eagle Spring Organic LLC ("Defendants") on or about November 8, 2019; and

WHEREAS, on December 16, 2019, Defendants' served a Motion to Dismiss returnable January 24, 2020, with Plaintiff's responding papers due January 7, 2020 and Defendants' reply due January 13, 2020; and


WHEREAS, the parties have conferred regarding Plaintiff's time to respond to this Motion.

IS HEREBY STIPULATED AND AGREED by and between the parties in this action, as represented by their undersigned counsel, that Plaintiff's time to respond to Defendants' Motion is hereby extended up to and including January 31, 2020, and Defendants' time to Reply is extended to February 14, 2020 with the Motion return date being adjourned to February 28, 2020.


IT IS FURTHER STIPULATED AND AGREED that facsimile and/or electronic signatures of this stipulation shall be deemed originals for all purposes.

Dated: December 17, 2019

FREEMAN HOWARD, P.C.
Attorneys for Plaintiff

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PECKAR & ABRAMSON, P.C.
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SO ORDERED

Hon. Christian F. Hummel
United States Magistrate Judge